

Exhibit 11

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
SHADEESHA BROWN and GABRIEL PEREZ,

Plaintiffs,

-against-

Index No.
11 CIV. 1068 (PKC)

THE CITY OF NEW YORK, BRIAN McALEAR,
KEITH HOCKADAY, FREDERICO MARTINEZ,
JOAQUIN MORALES, ROBERT DOWNES,
THOMAS ALBANO, GERARD FLOOD,
WILLIAM HART, TIMOTHY MURPHY,
KEYNYETTA ROUSE and THOMAS LONGA,

Defendants.
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Michelstein & Associates
485 Madison Avenue
New York, New York 10022
March 6, 2012
10:19 A.M.

EXAMINATION BEFORE TRIAL of JOAQUIN MORALES, a
Defendant held at the above time and place pursuant to
Order, taken before, ASHLEY COHEN a Notary Public of the
State of New York.

1 J. MORALES

2 that day.

3 Q. Could you hear the ESU team enter the
4 apartment?

5 A. From where I am, yes, you can hear them.

6 Q. Did you actually hear them enter the
7 apartment?

8 A. This specific day I don't remember what I
9 heard.

10 Q. How long were you waiting in the landing
11 before you were told that you could go into the
12 apartment?

13 A. For this particular incident I don't
14 know. It varies. I don't recall.

15 Q. Could it have been more than ten minutes?

16 A. Could it have been? Anything is
17 possible. It could be or it could not. In this
18 instance, I don't recall how long, you know, but it
19 wasn't more than ten minutes.

20 Q. You're sure it was not more than ten
21 minutes?

22 A. It was not more than ten minutes in this
23 instance.

24 Q. Did you make any written record of the
25 time that you left the PSA 7 Precinct to go to 1368